

**BEFORE THE
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

IN RE:)	Docket No. 2009-144-C
Application of TracFone Wireless,)	
Incorporated For Designation as an)	MOTION FOR EXTENTION OF
Eligible Telecommunications Carrier in)	TIME FOR FILING
the State of South Carolina for the)	SURREBUTTAL TESTIMONY
Limited Purpose of Offering Lifeline)	AND RESPONSIVE
Service to Qualified Households)	PLEADINGS
)	

The South Carolina Office of Regulatory Staff (“ORS”) hereby respectfully submits this Motion for an Extension of Time for Filing Surrebuttal Testimony and Responsive Pleadings in this matter.

ORS is in receipt of TracFone Wireless, Inc.’s (“TracFone” or “the Company”) Rebuttal Testimony of F.J. Pollak and Legal Memorandum in Support of Rebuttal Testimony filed with the Public Service Commission of South Carolina (“Commission”) on July 30, 2009. The rebuttal testimony and legal memorandum asserts legal positions of the Company and responds to the Direct Testimony of James M. McDaniel filed by ORS, ten (10) business days prior, on July 15, 2009.

The rebuttal testimony and legal memorandum raise legal arguments and issues in which ORS intends to respond. ORS seeks an extension of time to respond to such arguments. At the time the Company consulted with ORS regarding the Company’s Motion for an Extension of Time for the Remaining Pre-filed Testimony Deadlines, (filed by the Company on July 22, 2009) ORS was not made aware that the Company would also be filing a legal memorandum in which ORS would need to respond. Currently, the filing date for surrebuttal testimony is August 6, 2009. ORS requests that, at a minimum,

an additional ten (10) business days be afforded to file surrebuttal testimony and any responsive filing ORS deems necessary in order to respond to the Company's legal memorandum filed on July 30 and received by ORS on Friday, July 31, 2009. This additional time will allow ORS to fully respond to the arguments and issues addressed by the Company.

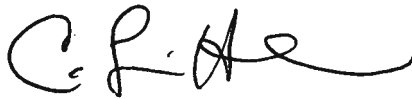
Furthermore, ORS requests that a hearing be scheduled for oral arguments to address the issues outlined in the Company's legal memorandum. As these issues are legal in nature, it is appropriate for a separate hearing for oral arguments to be scheduled, as opposed to the witnesses addressing the issues in the merits hearing.

Finally, Counsel for ORS will not be available August 19-21, 2009.

CONCLUSION

For the reasons set forth above, ORS requests an extension of at least ten (10) business days to file surrebuttal testimony and any responsive filing ORS deems necessary in order to respond to the Company's legal memorandum.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'C. L. Hammonds', with a stylized flourish at the end.

C. Lessie Hammonds
lhammon@regstaff.sc.gov
1401 Main Street, Suite 900
Columbia, SC 29201
(803) 737-0803

Counsel for Office of Regulatory Staff

August 4, 2009

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2009-144-C

IN RE: Application of TracFone Wireless, Incorporated)
for Designation as an Eligible)
Telecommunications Carrier in the State of South) **CERTIFICATE OF**
Carolina for the Limited Purpose of Offering) **SERVICE**
Lifeline and Link Up Service to Qualified)
Households)


This is to certify that I, Pamela J. McMullan, have this date served one (1) copy of the **Motion For Extension of Time** in the above-referenced matter to the person(s) named below by causing said copy to be deposited in the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown below:

Debra McGuire Mercer, Esquire
Greenberg Traurig, LLP
2101 L Street, NW
Washington, DC, 20037

Mitchell F. Brecher, Esquire
TracFone Wirelss, Incorporated
Greenberg Traurig, LLP
2101 L Street, NW
Washington, DC, 20037

D. Larry Kristinik, Esquire
Nelson Mullins Riley & Scarborough, L.L.P.
Post Office Box 11070
Columbia, SC, 29211

Jeremy C. Hodges, Esquire
Nelson Mullins Riley & Scarborough, L.L.P.
Post Office Box 11070
Columbia, SC, 29211



Pamela J. McMullan

August 3, 2009
Columbia, South Carolina